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June 17, 2004

VIA ELECTRONIC FILING

Marlene H. Dortch, Secretary
Office of Managing Director
Federal Communications Commission
445 12th Street, S.W.
Room TW-B204
Washington, DC 20554

Attn: Wireline Competition Bureau

**Re: Guam Cellular and Paging, Inc. d/b/a Saipancell
Petition for Designation as an Eligible Telecommunications
Carrier on the Islands of Saipan, Tinian and Rota in the
Commonwealth of the Northern Mariana Islands
CC Docket No. 96-45**

Dear Madam Secretary:

Guam Cellular and Paging, Inc. d/b/a Saipancell ("Saipancell") hereby amends its above-referenced petition for ETC status in the Commonwealth of the Northern Mariana Islands ("CNMI")¹ to provide information requested by the Commission, through its Wireline Competition Bureau ("WCB"), in addition to the information provided in Saipancell's amendments dated March 9, 2004 ("March 9 Amendment") and June 14, 2004 ("June 14 Amendment").

In response to a request from Bureau staff for specific information regarding an initial network build plan, Saipancell filed the June 14 Amendment, which set forth detailed information regarding the nature and location of the proposed facilities that were referred to in

¹ Guam Cellular and Paging, Inc. d/b/a Saipancell, Petition for Designation as an Eligible Telecommunications Carrier on the Islands of Saipan, Tinian, and Rota in the Commonwealth of Northern Mariana Islands, CC Docket No. 96-45 (filed Feb. 19, 2002)("Petition"). Amendments to the Petition were filed on April 15, 2002, May 8, 2002, October 15, 2002, January 22, 2003, February 10, 2003, March 9, 2004, and June 14, 2004.

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the March 9 Amendment. Following the filing of the June 14 Amendment, Staff asked Saipancell to provide an approximate timetable for constructing the proposed cell sites set forth in Exhibit A to the June 14 Amendment.

As we discussed with Commission staff, the rate at which Saipancell can construct the proposed sites depends on the level of support it receives. In the two years since Saipancell's Petition was filed, projected per-line support levels have fluctuated considerably, resulting in a large drop-off in projected per-line support. For example, according to USAC's per-line projections for Third Quarter 2003, Saipancell was projected to receive approximately \$59,000 per month, or approximately \$700,000 in its first year as an ETC. However, according to USAC's most recent projection (Third Quarter 2004), Saipancell is projected to receive approximately \$23,000 per month, or approximately \$280,000 in the first year following its designation -- less than half the Third Quarter 2003 figure. Recently, Saipancell made an inquiry with USAC staff to ascertain the reason for the steep decline in projected support between this year and last. As of this date, a response has not been provided and Saipancell cannot predict future support levels at this time.

Based on the most recent estimate set forth above, Saipancell estimates that it will be able to complete construction of the first proposed site within one year of being designated as an ETC and to complete one additional site in each subsequent year. Should per-line support continue to decline, Saipancell may require more time to complete construction of its initial build plan. Conversely, should per-line support levels increase significantly, Saipancell expects to move forward with construction projects more rapidly.

We trust that you will find this information to be useful. Should you have any questions or require any additional information, please contact undersigned counsel directly.

Respectfully submitted,

GUAM CELLULAR AND PAGING, INC.
D/B/A SAIPANCELL

By: _____/s/_____
David A. LaFuria
Steven M. Chernoff
Its Counsel

cc: Thomas Buckley, Esq.
Lawrence W. Katz, Esq